

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DEUTSCHE BANK TRUST COMPANY)	Civil Action No. 11-CV-00358
AMERICAS, in its capacity as successor)	
indenture trustee for certain series of)	JUDGE BECKWITH
Senior Notes, <i>et al.</i> ,)	MAGISTRATE JUDGE BOWMAN
)	
Plaintiffs,)	
v.)	
)	
AMERICAN ELECTRIC POWER, <i>et al.</i> ,)	
)	
Defendants.)	

**UNOPPOSED MOTION OF DEFENDANT BERNARD RABINOWITZ
INDIVIDUALLY AND AS TRUSTEE FBO BERNARD RABINOWITZ
U/A/D/ 09-11-2006 FOR ENTRY OF AGREED ORDER EXTENDING
TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS'
SECOND AMENDED COMPLAINT**

Plaintiffs Deutsche Bank Trust Company Americas, in its capacity as successor indenture trustee for certain series of Senior Notes, Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for certain series of Senior Notes, and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes (“Plaintiffs”), and Defendant Bernard Rabinowitz, individually and as Trustee FBO Bernard Rabinowitz U/A/D 09-11-2006 (“Rabinowitz”), have agreed to extend the time within which Defendant Rabinowitz may answer or otherwise respond to Plaintiffs’ Second Amended Complaint, until January 30, 2012, or 30 days after the record in this case is docketed in a Multidistrict Litigation case, subject to any stay of proceedings that may otherwise be ordered by the Court. Accordingly, pursuant to Local

Rule 7.3(a) and 7.4, Defendant Rabinowitz hereby moves the Court to grant the requested extension per the parties' agreement.

AGREED:

<u>/s/Charles C. Ashdown</u> Charles C. Ashdown STRAUSS & TROY 150 E. Fourth Street Cincinnati, OH 45202-4018 Tel: 513.621.2120 Email: ccashdown@strausstroy.com James Chou Jason L. Goldsmith AKIN GUMP STRAUSS HAUER & FELD LLP 1 Bryant Park New York, New York 10036 Tel: 212.872.8030 Email: jchou@akingump.com <i>Counsel for Plaintiffs Deutsche Bank Trust Company et al.</i>	<u>/s/ Daniel John Donnellon</u> Daniel John Donnellon Faruki Ireland and Cox 201 East Fifth Street Suit 1420 Cincinnati, Ohio 45202 Tel: 513.481-4770 Email: ddonnellon@ficlaw.com <i>Counsel for Defendant Bernard Rabinowitz individually and as Trustee FBO Bernard Rabinowitz U/A/D 09-11-2006</i>
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been filed electronically with the U.S. District Court and has been sent electronically this 30th day of November, 2011. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Charles C. Ashdown

Charles C. Ashdown